IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF ALABAMA NORTHERN DIVISION

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J.S., (a minor child by and through his father and next fried, John Seawright),

Plaintiff,

VS.

Civil Case No. 02:05-cv-928-WKW

Officer Curt Campbell, in his individual capacity,

Defendant.

DEFENDANT'S REQUESTED VOIR DIRE

COMES NOW Defendant, by and through counsel, and requests the Court to ask the following questions during voir dire:

- Have you or any member of your family had any connection with the Fort Deposit Police 1. Department? If so, please state the nature of your contact with the City of Fort Deposit Police Department.
- Have you or any member of your family ever been treated for mental health problems? 2.
- Has anyone ever been arrested for disorderly conduct or had friends or family arrested for 3. disorderly conduct?
- Does anyone have a bias or prejudice against police officers or law enforcement? 4.
- 5. Do any of you feel that a police officer should not restrain a juvenile under any circumstances?
- 6. Have any of you ever protested the war, abortion, or any engaged in any other similar expressions of your rights to free speech under the First Amendment?

Alex L. Holtsford, Jr. (HOL048) Rick A. Howard (HOW045) April W. McKay (WIL304) Attorneys for Defendants

OF COUNSEL: Nix Holtsford Gilliland Higgins & Hitson, P.C. Post Office Box 4128 Montgomery, Alabama 36103-4128 334-215-8585

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was served upon the following, via United States Mail, postage prepaid, on this the day of ________, 2006.

Jay Lewis Andy Nelms 847 S. McDonough Street Montgomery, Alabama 36104